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November 20, 2023

VIA ECF

The Honorable Analisa Torres
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

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Re: United States v. Ho Wan Kwok, et al., 23 Cr. 118 (AT)

Dear Judge Torres:

We represent Yanping Wang in this matter. We write to follow-up on the Court's November 14, 2023 memo endorsement, ECF No. 169, which held in abeyance the previously scheduled November 15 defense motion deadline.

After conferring with the government and counsel for defendant Ho Wan Kwok, we write to request the following (an approximately one-month extension of the deadline):

- Defense motions due December 15
- Government opposition due January 18
- Defense reply, if any, due February 1

The government does not object to the defendants' proposed motion schedule

All other deadlines and dates in the case would remain the same. The defendants specifically request that the Court maintain the April 8, 2024 trial date. The government requests that, to the extent that the extension of deadlines necessitates—in conjunction with other motion practice—an adjournment of the trial date by the Court, that any adjournment be proportionate to the extension of the pretrial motions briefing schedule (i.e., approximately four to six weeks).

Respectfully submitted,

/s/ Brendan F. Quigley
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